

# memorandum

Date: August 17, 2006

Subject: Approval to Proceed with Preparation of Engineering Evaluation/Cost Analyses (EE/CAs) for General Decommissioning Activities under the Idaho Cleanup Project (FMDP-RFDP-06-047)

To: Idaho Cleanup Project CERCLA Administrative Record File

## Background:

This memorandum initiates the process for accomplishing general decontamination, decommissioning, and dismantlement (DD&D) activities for facilities under the Idaho Cleanup Project (ICP), through the use of Non-Time Critical Removal Action (NTCRA) authority. Performance of the activities described herein will be in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 USC § 9601 et seq.), as amended by the "Superfund Amendments and Reauthorization Act of 1986 (SARA)" (Public Law 99-499), and with the "National Oil and Hazardous Substances Pollution Contingency Plan" (40 CFR Part 300). This action is consistent with the joint U.S. Department of Energy (DOE) and U.S. Environmental Protection Agency (EPA) *Policy on Decommissioning of Department of Energy Facilities Under the Comprehensive Environmental Response, Compensation, and Liability Act* (DOE and EPA 1995), which establishes the CERCLA NTCRA process as an acceptable regulatory approach for DD&D. This memorandum also opens an administrative record for information supporting selection of the general decommissioning methodology.

The scope of this NTCRA is intended to encompass all remaining low-risk DD&D actions identified under the ICP Contract (Contract No. DE-AC07-05ID14516). The scope will further include DD&D preparatory activities for the high-risk facilities identified in the ICP Contract, but will exclude the end-state decisions for the high-risk facilities and decisions regarding reactor vessel disposition. Activities already identified under existing Action Memoranda or remedial actions pursuant to the Federal Facility Agreement and Consent Order are also excluded. The types of wastes expected to be encountered during the general decommissioning of these facilities includes, but is not limited to: solid wastes, low-level wastes from removal of contaminated piping, equipment, and structural materials, asbestos-containing material, and PCB-contaminated material.

## Proposed Projects:

This NTCRA is expected to comprise removal and disposal of solid wastes, low-level wastes (such as contaminated piping, equipment, and structural materials), asbestos-containing material, and PCB-contaminated material. Other hazardous substances may be encountered, or generated, during the general DD&D of those buildings and structures identified in the ICP contract, which will have disposition in accordance with applicable, or relevant and appropriate requirements. Conducting these DD&D activities through the CERCLA NTCRA approach will allow

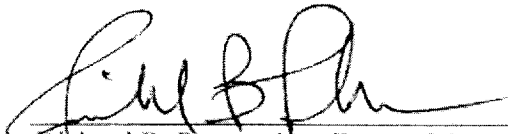
appropriate management of wastes generated by ICP DD&D actions. In so doing, initiation of the removal of contaminated material would be expedited and the overall protectiveness of human health and the environment will be enhanced through the performance of the removal action.

An Engineering Evaluation/Cost Analysis (EE/CA) will be performed to evaluate suitable alternatives and to provide cost estimates for the NTCRA. The selected alternative to perform the general decommissioning activities will be described in an Action Memorandum. The EE/CA and Action Memorandum will be subject to the CERCLA Community Relations Plan requirements for stakeholder notifications and involvement. Preparation of the EE/CA and public involvement activities will be performed in accordance with the NTCRA and are intended to satisfy environmental review requirements of the National Environmental Policy Act (NEPA).

**Approval to Conduct Engineering Evaluation and Cost Analyses (EE/CA):**

Approval is hereby given by DOE-ID to conduct EE/CA for the general decommissioning of those buildings and structures identified in the ICP contractor for demolition including the deactivation and decontamination activities associated with the high risk facilities that are not addressed in the high-risk facilities specific EE/CA. Nolan Jensen is designated as the spokesperson for this EE/CA. The completed EE/CA shall be made available for public review and comment.

APPROVED:

  
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Richard B. Provencher, Deputy Manager  
Idaho Cleanup Project

8/21/06  
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Date